



(\$10,000,000.00 US) US DOLLARS plus pre and post judgment interest. See Exhibit "1." The judgment is now final, fully enforceable and due to Movant in full plus interest accruing from and after the date of the Judgment.

2. The Defendant MAT Securitas Express AG has three (3) businesses in the United States of America which businesses are:

- a) VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096;
- b) VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and
- c) VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045.

Attached hereto and marked as Exhibit "1" is a true and correct copy of information of these business from the MAT Securitas Express AG (MSE) website off the internet.

3. It is believed that MAT Securitas Express AG is the shareholder of each of these entities, or in the alternative, receives franchise payments, license fees, or like payments from each of these operations.

4. MAT Securitas Express AG's interest or financial returns from each of these entities are not exempt from attachment, execution, or other seizure for the satisfaction of liabilities.

5. The shareholding interest of MAT Securitas Express AG in each of these entities or, any financial returns which MAT Securitas Express AG receives from these entities is not amongst the categories of assets exempt from seizure by the Texas Property Code or any other provisions of Texas law and, according, may be utilized to satisfy the judgment. However, because some of the assets described above constitutes securities, contract interests and intangible property rights, or, the current whereabouts are unknown, they are not subject to levy by ordinary legal process. Accordingly, pursuant to §31.002 of the Texas Civil Practice and Remedies Code, the Court may

order each of these US entities to turnover the identified property which is property of the Debtors and all necessary documentation to transfer the ownership of such property rights and interests, together with any other undisclosed stocks, securities, bonds, marketable securities, contract rights, partnership interests that are in the name of the Debtor to either the United States Marshal's Office or, to the Bexar County Sheriff's Offices for execution and application to Movant's judgment.

6. Movant requests this Court enter an Order ordering each of:

- a) VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096;
- b) VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and
- c) VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045.

to turnover to the United States Marshals or to the Bexar County Sheriff the following described property and documents within five (5) days of service of the Order on those entities and then, each of the items detailed be set for sale as under a writ of execution with the application of the proceeds to be applied to the satisfaction of Movant's judgment.

- a) All corporate shares to which the Debtor MAT Securitas Express AG is the owner, either legally or beneficially;
- b) Any and all ownership interest, be it by way of partnership, joint venture or otherwise which interest is owned by MAT Securitas Express AG in VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096; VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045.
- c) Any and all contract rights, franchise fees, license fees, or any other form of payment made by VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096 to the Debtor;
- d) Any and all contract rights, franchise fees, license fees, or any other form of payment made by VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004 to the Debtor;

- e) Any and all contract rights, franchise fees, license fees, or any other form of payment made by VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 to the Debtor.

7. Movant further requests that this Court:

- a) **Order** VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096 turnover to the United States Marshal's Office and/or to the Bexar Sheriff's Office any and all documents necessary to transfer ownership and control of the above described assets and rights to receive any income, dividends, payments, commissions, licenses fees, franchise fees or any other amounts from VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096 to the Judgment Debtor within five (5) days of the date of any Order granting this Application for Turnover; **Order** VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004 turnover to the United States Marshal's Office and/or to the Bexar Sheriff's Office any and all documents necessary to transfer ownership and control of the above described assets and rights to receive any income, dividends, payments, commissions, licenses fees, franchise fees or any other amounts from VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004 to the Judgment Debtor within five (5) days of the date of any Order granting this Application for Turnover. **Order** VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 turnover to the United States Marshal's Office and/or to the Bexar Sheriff's Office any and all documents necessary to transfer ownership and control of the above described assets and rights to receive any income, dividends, payments, commissions, licenses fees, franchise fees or any other amounts from VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 to the Judgment Debtor within

five (5) days of the date of any Order granting this Application for Turnover;

- b) **Order** each of VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096; VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 to turnover those continuing benefits or repetitive benefits or payments when immediately due to MAT Securitas Express AG, along with any documentation of those benefits to the United States Marshal's Office and/or the Bexar County Sheriff's Office to the extent that the property is a subject of this Motion for Turnover and is continuous or repetitive in its benefits to the Judgment Debtor.
- c) **Order** that VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096; VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 be required to give an accounting to Movant to be received by Movant's attorney; Glenn J. Deadman, 509 South Main Avenue, San Antonio, Texas 78204 USA. no later than five (5) business days after the delivery of this Order on them.
- d) Alternatively or in addition, Movant asks the Court to approve a disinterested and qualified third person as receiver and order each of VIA MAT International, 130 Sheriden Blvd., Inwood, New York 11096; VIA MAT International, 2070A Tigertail Blvd., Dania, Florida 33004; and VIA MAT International (USA) Inc., 5777 West Century Blvd., Los Angeles, California 90045 to turnover all property rights and ownership rights in their possession that are owned by MAT Securitas Express AG, the Judgment Debtor, for the receiver to administer.

8. As a result of MAT Securitas Express AG failure and refusal to pay the judgment rendered in this cause, Movant has been required to retain the undersigned legal counsel to institute and prosecute this Motion. Movant is therefore entitled to recover from Defendants the sum of THREE THOUSAND FIVE HUNDRED and 00/100 (\$3,500.00 US) US DOLLARS as reasonable attorney's services rendered and to be rendered in this Court. In the event of an appeal or other proceeding in the Court of Appeals, Movant would be further entitled to FIVE THOUSAND and 00/100 (\$5,000.00 US) US DOLLARS as reasonable attorney's fees.

WHEREFORE, PREMISES CONSIDERED Movant prays that the relief requested in this Motion be granted and an Order entered.

Respectfully submitted,

*Law Offices of Glenn J. Deadman, P.C.*

509 South Main Avenue

San Antonio, TX 78204

(210) 472-3900-Telephone

(210) 472-3901-Facsimile



Glenn J. Deadman

SBN: 00785559


#### **CERTIFICATE OF SERVICE**

I hereby certify that on this the 21 day of July, 2008 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of filing to the following:

Mr. Samuel Zeller, Manager  
c/o MATS Securitas Express AG  
MSE-Zurich  
Steinackerstrasse 49  
Postfach  
8302 Kloten, Zurich Switzerland

and hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Mr. Samuel Zeller, Manager  
c/o MATS Securitas Express AG  
MSE-Zurich  
Steinackerstrasse 49  
Postfach  
8302 Kloten, Zurich Switzerland



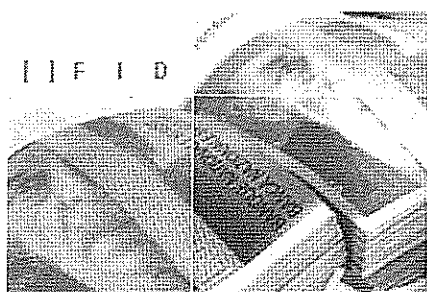
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Glenn J. Deadman

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## **EXHIBIT "1"**





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safe from safe to safe

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- > Whoever has to transport large valuables, wishes an especially trusting partner. **MAT SECURITAS EXPRESS AG (MSE)** is the number one in valuables logistics in Switzerland. For 60 years we transport, store, insure and process valuables with great diligence and the highest quality.



- > Our customers rely on our knowledge, our well-trained employees, and our region-wide offerings with the most modern infrastructure.

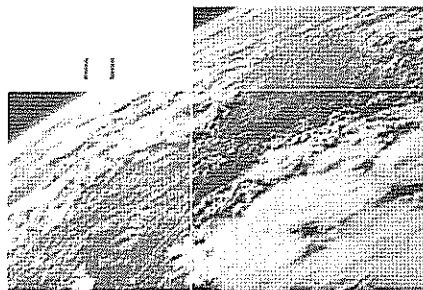
**Our main services:**

- Valuables transports and courier services
- Processing of banknotes
- Processing of coins
- Storage of valuables and data carriers
- Management of ATMs (Automatic Teller Machines)
- Supply and delivery of safety packaging for all kinds of valuable goods
- E-Shop

**Your benefits:**

- You have the market leader on your side
- We are a reputable market connoisseur with 60 years of experience
- Region-wide offerings with eleven selected locations (CH/FL)
- Complete Cash Center Service
- We only work with well-trained and trustworthy employees
- We value high safety standards

**MSE is a founding and executive member of the Association of Swiss Security Service Companies (VSSU).**



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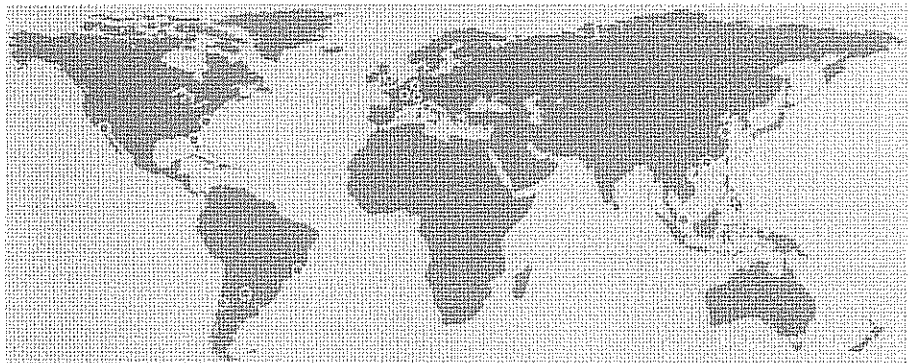
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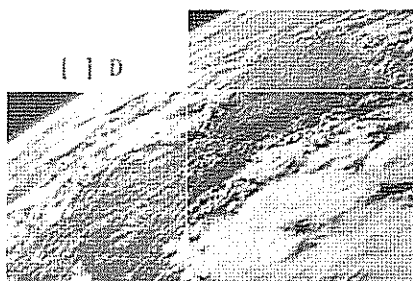
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#### Welcome to the world of the VIA MAT-Group

The VIA MAT-Group has continually grown in the past sixty years and is today represented in more than ten countries on four continents. Join us on a tour around the world and learn more about our subsidiaries and the services offered in the various countries.



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#### **Trust us with your most precious valuables: your goods**

When you are looking to transport valuable items, you expect safety and dependability, to be more than just a promise. For over 60 years the VIA MAT Group guarantees their customers safe and dependable first-class transport and logistic solutions.

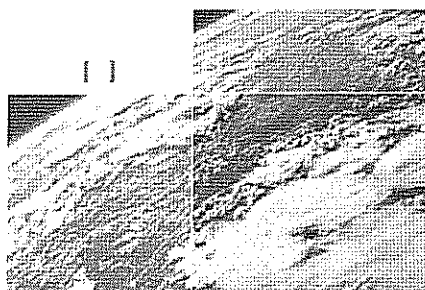
#### **Close customer relationships: your advantage**

The VIA MAT Group offers specialized niche market know-how within a large corporate network and at the same time provides versatile, flexible solutions to each individual logistics demand.

#### **The services of the VIA MAT Group include:**

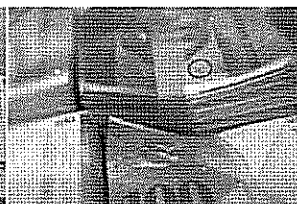
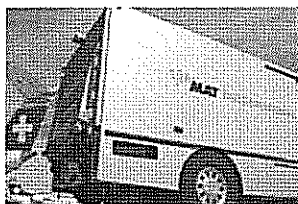
- Valuables logistics in Switzerland & International valuables logistics
- International cargo transportation: air freight, sea freight, road and rail transports, special transports, automotive transports, project shipping and customs clearance
- Parcel logistics
- Logistics solutions for your outsourcing needs
- Warehousing logistics
- Shipping representation
- Art and film logistics
- Safety packaging
- Heavy cargo logistics





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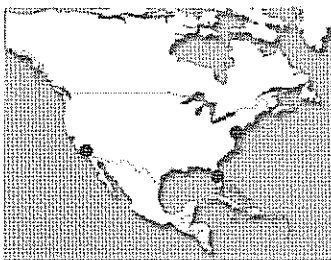
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#### Address

**VIA MAT INTERNATIONAL**

VIA MAT INTERNATIONAL (USA) INC.  
130 Sheridan Blvd.  
US-Inwood, NY 11096

Phone: +1 718 868 1500  
Fax: +1 718 868 1181  
E-Mail: [vmi.newyork@viamat.com](mailto:vmi.newyork@viamat.com)

#### Services

- International transportation, processing, storage and handling of valuables: precious metals, currency notes, silver,
- Long-term warehousing in New York
- Transportation service with GPS-monitored armored vehicles
- General cargo services
- etc.

**VIA MAT INTERNATIONAL**

VIA MAT INTERNATIONAL (USA) INC.  
2070A Tigertail Blvd.  
US-Dania, FL 33004

Phone: +1 954 922 3809  
Fax: +1 954 922 3810  
E-Mail: [vmi.miami@viamat.com](mailto:vmi.miami@viamat.com)

- International transportation of valuables
- Transportation in own GPS-monitored armored vehicles
- Storage of precious metals and currency notes
- Courier services to the Caribbean islands and South American destinations
- etc.

**VIA MAT INTERNATIONAL**

VIA MAT INTERNATIONAL (USA) INC.  
5777 West Century Blvd.  
Suite 1255  
US-Los Angeles, CA 90045

Phone: +1 310 568 8660  
Fax: +1 310 568 8886  
E-Mail: [vmi.losangeles@viamat.com](mailto:vmi.losangeles@viamat.com)

- International transportation, processing, storage and handling of valuables: precious metals, currency notes, silver,
- Long-term warehousing in Los Angeles
- Transportation service with GPS-monitored armored vehicles
- General cargo services
- etc.